

MEMO ENDORSED

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Application GRANTED.

December 18, 2019

VIA ECF

Honorable Valerie E. Caproni
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

SO ORDERED.



12/19/2019

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE
RE: *United States of America v. Corey Cray*
19 Cr 166 (VEC)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 12/19/2019

Honorable Caproni,

Please be advised that Ms. Meusette Gonzalez is currently a Paralegal that has been trained to conduct in depth legal interviews, organize files and perform research. Moreover, Mr. Cray has significant social media documents, surveillance, audio and at least a half terabyte of information to be provided to me by the discovery coordinator assigned. As such, it would be of great assistance to the undersigned if the Court would appoint Ms. Gonzalez paralegal responsibilities for general paralegal duties in the above-referenced multi-defendant matter.

Ms. Gonzalez is a John Jay College graduate with a B.A. in Criminal Justice. Prior to her employment with my firm, Ms. Gonzalez was employed by the New York State Attorney General's Office Consumer Fraud Bureau. Moreover, Ms. Gonzalez has been previously assigned such responsibilities by the Honorable Naomi R. Buchwald in the case of U.S.A. v. Cibik 11 Cr 424 (NRB), Honorable Paul A. Engelmayer in U.S.A. v. Jose Mejia 11 Cr 1032 (PAE), Honorable John F. Keenan in U.S.A. v. Angelo Michel 11 Cr 755 (JFK), Honorable Robert W. Sweet in U.S.A. v. Laron Mosley 13 Cr 654 (RWS), the Honorable Laura Taylor Swain in U.S.A. v. Deshawn Stewart 13 Cr 271 (LTS) and the Honorable Colleen McMahon in U.S.A. v. Quincie Bardel 15 Cr 654 (CM), Honorable Ronnie Abrams U.S.A. v. Espedicto-Peralta 15 Cr 599 (RA), Honorable Alison J. Nathan U.S.A. v. Martin Mitchel (AJN), Honorable Vernon S. Broderick U.S.A. v. Ruben Vizcarrondo 17 Cr 292 (VSB), Honorable Loretta A. Preska U.S.A. v. Levan Makashvili 17 Cr 350 (LAP), Honorable Andrew L. Carter, Jr. U.S.A. v. Granados-Corona 16 Cr 324 and Honorable Victor Marrero U.S.A. v. Walston Owen 16 Cr 809 (ALC).

For all the aforementioned reasons, I firmly believe that Meusette Gonzalez should be appointed paralegal responsibilities at a rate of \$75.00 per hour for a maximum of 60 hours. Notably, Ms. Gonzalez's appointment will reduce the number of hours required to travel to and from MDC in order to review the voluminous discovery.

Thank you kindly in advance for your consideration.

Sincerely,
DONALDSON & CHILLIEST, LLP

/s/ *Xavier R. Donaldson*
Xavier R. Donaldson, Esq.